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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

DONALD CHAIRES, GEORGE  
DENAULT, JANE DOE, JOHN DOE,  
BRITTANY GILLELAND, GERALD  
GIRARD, SARA HASSELBACH,  
LINDSEY KINHAN, JOSEPH  
MCLAUGHLIN, MARILYN PERSON,  
MATTHEW TEACHMAN, and KARYN  
WOFFORD,

Plaintiffs,

v.

NOVO NORDISK INC., ELI LILLY AND  
COMPANY, and SANOFI-AVENTIS U.S.  
LLC,

Defendants.

Civil Action No. 17-699(BRM)(LHG)

**STIPULATION AND ORDER**

HECTOR VALDES and HECTOR J.  
VALDES, individually and on behalf of all  
those similarly situated,

Plaintiff,

v.

SANOFI-AVENTIS U.S., LLC, NOVO  
NORDISK INC., and ELI LILLY AND  
COMPANY,

Defendants

Civil Action No. 17-939(BRM)(LHG)

IT IS HEREBY stipulated by and among the parties as follows:

1. Each Defendant hereby acknowledges that it either has been served, or by this stipulation, has accepted service of the complaints in Civil Action Nos. 17-699(BRM)(LHG) and 17-939(BRM)(LHG) (the "Actions"), and waives any defense as to improper service of process. All other defenses, including defenses with respect to personal jurisdiction, are preserved.
2. For purposes of Rule 5(b) of the Federal Rules of Civil Procedure and Rule 5.1 of the Local Civil Rules, the Parties agree that they shall serve papers, including pleadings, discovery requests, and trial materials, on each other through e-mail or ECF, as applicable, except to the extent that transmission of any such documents electronically is impractical, in which event service shall be made by hand or through overnight delivery to counsel of record for the receiving Party.
3. Without prejudice to any Defendant's right at any time in the future to move to sever the claims against it or otherwise to challenge the joinder of claims against different Defendants, and without prejudice to any defense that any Defendant has as to a particular plaintiff or plaintiffs, the Actions are hereby consolidated for all purposes under Civil Action No.

17-699(BRM)(LHG) pursuant to Rule 42(a) of the Federal Rules of Civil Procedure, using the following caption:

In re INSULIN PRICING LITIGATION

Civil Action No. 17-699(BRM)(LHG)

Going forward, all papers related to the Actions shall be filed in Civil Action No. 17-699 (BRM)(LHG) only.

4. Plaintiffs shall file a Consolidated Complaint on or before March 17, 2017.

5. Defendants shall answer, move against or otherwise respond to the Consolidated Complaint on or before May 17, 2017.

6. In the event that any Defendant moves against the Consolidated Complaint, (i) Plaintiffs' responsive papers shall be filed on or before June 17, 2017, (ii) and Defendants' reply papers shall be filed on or before July 14, 2017.

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ELI LILLY AND COMPANY

By: /s/ Emily R. Freeman  
EMILY R. FREEMAN

SO ORDERED this 22 day of February, 2017

LOIS H. GOODMAN, U.S.M.J.

It is so ordered this 22 day  
of February, 2017  
Brian R. Martinotti  
Brian R. Martinotti, U.S.D.J.